

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

**1672**

**USEPA Comments**

Comment #: 1

Commenting Organization: USEPA

Commentor:

Section #:                      Page #:                      Line #:

Code:

Comment:      The description of operations and processes in Volume 1 is missing pages 20 and 25.

Response:      These pages were inadvertently omitted from the document.

Action:      The missing pages 20 and 25 from the Description of Operations and Processes document have been included in the Final Remedial Design (RD) Documents Package.

Comment #: 2

Commenting Organization: USEPA

Commentor:

Section #:                      Page #:                      Line #:

Code:

Comment:      The design criteria text on lines 8 and 9 of page 30 in Volume 1 has been revised to exclude a contamination barrier that was to be embedded under the surface of the main waste processing and railcar loadout building. On lines 40 and 41 of page 30, and line 1 of page 31 in Volume 1 of the draft RD document package, the contamination barrier was proposed to control the migration of contaminants through the building floor and into the underlying soil.

Response:      Although the construction of the contamination barrier into the floors of the railcar loadout building and material handling building was identified as a means of facilitating the D&D of these facilities through minimizing the migration of contaminants through the floor, this measure has not been carried forth into the design. For consistency throughout the design documents, therefore, reference to this barrier was deleted from the subject section. DOE acknowledges that although it considered this change to be a clarification, it should have considered the potential sensitivity of the issue, and alerted the EPAs of the change.

The placement of a "built-in barrier" involves either the placement of a "barrier" either below or above the concrete surface. A barrier below the concrete serves no purpose in minimizing contamination within the concrete (which is what the discussion on the referenced pages is focusing on). A barrier at the top of the concrete may be of value if migration into the concrete is thought to be a problem. This is discussed below.

The need for the barrier includes the following considerations:

- 1)      Both the railcar loadout building and the material handling building will be covered, and have exterior walls that range from about  $\frac{3}{4}$  height to full

1672

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

height. Such measures provide a means of controlling stormwater from impacting waste material stored in the facilities.

- 2) The waste material being stored in the railcar loadout building will have a low moisture content, such that it will meet the PCDF WAC, and as such will not in itself be a migration concern. The railcar loadout facility will, however, have curbs and sumps to facilitate the containment and collection of water which may collect on the floor.
- 3) Although the waste material to be stored in the material handling building will generally have a higher moisture content, this facility has been designed to collect and control leachate from the waste. Specifically, the floor of the material handling building will be sloped, and will have a series of trench drains and sumps to collect water which may permeate from the stored material, thereby reducing the amount of ponding on the floor and decreasing the potential for migration into the concrete.
- 4) Finally, it is worth noting that these remediation facilities will have an anticipated operational period of only about 5 ½ years, after which the facility will be decontaminated and dismantled, and the soils in the area remediated (in accordance with the Sitewide Excavation Plan).

Based on the above, migration of contaminants into the concrete should not be an issue in the OU1 remediation facilities. From an engineering standpoint, therefore, there does not appear to be a demonstrable need for such a barrier.

It should be noted that the design of the remediation facilities (including some of the above considerations) meets the substantive requirements for waste piles. These requirements and the associated compliance strategy are discussed in Table 3-2c of the Design Criteria section of the RD Documents Package (Volume 1).

Nevertheless, DOE proposes to apply a sealant to any slab surfaces which have the potential to receive and store (for periods of time consistent with operational requirements) wetted waste material. Thus, the floor slab surfaces of the mixing bins in the Material Handling Building will receive such an application. This sealant will be typically a water based acrylic polymer which is applied by spray, brush, or other means. This is a commercial/industrial product designed to improve the chemical resistance of the concrete.

In addition, during facilities operations, routine building inspections will be performed, which will include inspections of the building floor slabs (e.g., for cracks, holes, etc.). Corrective actions/repairs will be made if problems are observed with the floor slabs.

The soils underneath these facilities, which include about four to six feet of fill material, placed upon existing potentially contaminated soil, have yet to be remediated. Accordingly, even if contaminants were to migrate through the concrete in the subject facilities, they would not impact certified areas. In

1672

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

addition, migration of any contamination through these soils would be minimized by the facilities over them, which would act as a cover, preventing infiltration.

Action: Section 6.0 has been revised to include the following text: "A sealer will be applied to the floor slab in facilities where wetted waste material can be expected to be received and stored (i.e., waste receiving/mixing bins in the Material Handling Building) so as to improve the chemical resistance of the concrete." Inspections and repairs of the floor slabs will be discussed in the Operations & Maintenance Plan, which is a part of the Remedial Action (RA) Documents Package scheduled for submittal to the EPAs by September 25, 1998, for review and approval.

**Ohio EPA Comments**

**General Comments**

Comment #: 1

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #:

Page #:

Line #:

Code: c

Comment: Obviously, Ohio EPA is concerned with DOE's proposed uncontrolled release of radon from the treatment system. However, we understand the technical implications of adding radon treatment via carbon absorption. Considering the cleanup objectives of the site, the limited duration of operations and the expected release rates, Ohio EPA concurs with the DOE's proposal to not treat radon with the following requirements: DOE will use the following administrative control limits for release of radon from OU1 operations: maximum hourly limit of 0.013 Ci/hr and a maximum annual release of 27 Ci/yr. Should the facility exceed either of these limits, DOE will initiate an immediate design/operations review to evaluate options for reducing radon emissions. Considering the facility design/operation assumed these emissions rates and Ohio EPA's concurrence with the design/operation was based upon them, we believe it is only prudent to re-evaluate the design/operation if these rates are exceeded.

Response: DOE agrees that it is prudent to evaluate, on an on-going basis, the actual radon emissions from the dryer stack to ensure that they are representative of estimated/planned emissions, and then take whatever actions are necessary to address any adverse situations. Specifically, DOE will evaluate the radon emissions data, for trending and/or magnitude exceedence, as the data becomes available. If the data reveals an adverse trend in emissions and/or an exceedence above what would have been expected (i.e., above the 0.013 Ci/hr predicted maximum hourly emission rate), DOE will take one or more of the following steps, as appropriate: 1) confirm the validity of the emissions numbers; 2) evaluate the cause of the trend/exceedence; 3) assess the impact of the trend/exceedence (e.g., the impact to the fence line levels); 4) determine if the trend has long-term implications; 5) identify actions necessary, if any, to address the situation; 6) develop a path forward, as required; 7) discuss the path forward with the EPAs, if action is deemed necessary; and 8) implement whatever actions, if any, are deemed

-1672

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

appropriate to address these emissions trends/exceedences. It should be noted that actions may not necessarily involve additions/modifications to the facility design/operations (e.g., additions/modifications to the air pollution control system).

In forwarding this response, DOE wishes to emphasize that it does not view the 0.013 Ci/hr value as a regulatory limit or a value upon which exceedence represents a concern. Rather, this value is a conservative administrative level that would trigger the stepped evaluation described above.

It should be noted that Ohio EPA apparently based its yearly estimate on an assumption that the dryer operation is a 5-day per week, 8-hours per day operation. For the record, the dryer operation is a 5-day per week, 24-hour per day operation that it is. Accordingly, the yearly base rate should be 81 Ci/yr, not 27 Ci/yr.

Action: Monitoring, controls, and contingency measures, such as those discussed above, will be discussed in various RA documents, such as the Operations & Maintenance Plan and the Sampling & Analysis Plan. The RA Documents Package is scheduled for submittal to the EPAs by September 25, 1998, for review and approval.

Comment #: 2

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #:

Page #:

Line #:

Code: c

Comment: Regarding DOE's 7/17/98 responses, Ohio EPA understands DOE's concerns regarding project specific high volume air monitoring for the Waste Pits Remedial Action Project as well as the substantial amount of health and safety monitoring that will occur. We continue to believe though, that project specific air monitoring will benefit the project, environment and public. Ohio EPA has considered DOE's proposal for us to conduct high volume air sampling. In a compromise we believe will be acceptable to all parties, Ohio will conduct sampling at former locations AMS-17 and AMS-19, while DOE would conduct sampling at former locations AMS-20 and AMS-18. Ohio EPA believes this proposal will result in the two agencies working together on data evaluation while presenting the least burdensome sampling approach for all parties involved. Details regarding sample parameters, reporting, etc. should be resolved between DOE and Ohio EPA with sufficient time to allow sampling start up prior to any excavation.

Response: As discussed during our meeting on August 17, 1998, and subsequent field walk down conducted on August 20, 1998, DOE will be revising the IEMP air monitoring program to reflect the addition of two high volume air monitors at the facility fence line. These additional monitors (located at former location AMS 19 and current location AMS 28) will provide a more frequent (bi-weekly) assessment of airborne thorium concentrations at the property boundary. Additionally, DOE will support Ohio EPA in establishing an additional Ohio EPA operated monitoring station at the former location of AMS 20.

1672

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

Action: Provide support to Ohio EPA for the installation of monitoring equipment at the former location of AMS 20. Include modification of the IEMP air particulate monitoring program as described above in the forthcoming revision of the IEMP.

Comment #: 3

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Page #: Line #: Code: c

Comment: Ohio EPA requested, during our 7/2/98 meeting, that DOE submit detailed and comprehensive air dispersion models indicating the locations of maximum ground level concentrations (MGLCs) for radon-222 and particulates. The dispersion model should include the two highest MGLC locations on the FEMP fenceline for each parameter, as well as, any MGLC locations on site. Ohio EPA believes that the results of the modeling can be used as a tool to allow DOE and Ohio EPA to choose the best possible locations for the radon and particulate samplers.

Response: DOE is currently conducting air dispersion modeling for Radon-222 and particulate emissions resulting from OU1 remedial activities. The results of these modeling activities will be presented in the revision of the IEMP (scheduled for submittal in September 1998) and used to support modifications to the IEMP air monitoring program. Additionally, see response to Ohio EPA General Comment #2.

Action: Conduct air dispersion modeling and present results in next IEMP revision.

Comment #: 4

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Page #: Line #: Code: general

Comment: At the 6/9/98 meeting reviewing the RtC on this design package, DOE stated that a 3 Ci/hr stack limit for the release of radon would result in a 0.5 pCi/L increase in radon concentrations at the fenceline. Further, it was stated that an incremental increase of 0.5 pCi/L at the fenceline would result in less than 0.5 mrem/yr dose (see DOE's 7/17/98 RtC letter). The dose estimate appears to be in error. The Site Environmental Reports from 1993 through 1996 state that fenceline concentrations ranging from 0.5 to 1.0 pCi/L result in doses in the 400 to 500 mrem/yr range. Ohio EPA requests that a comprehensive dose estimate based on releases of radon from the stack and fugitive radon emissions from the waste pits be performed. The dose estimate methodology should be consistent with the methodology used in the SER.

Response: In DOE's revised response to Ohio EPA Original Comment #26, which was transmitted to the EPAs by the subject July 17, 1998 letter, the statement was not that an "incremental increase of 0.5 pCi/L at the fenceline would result in less than 0.5 mrem/yr dose", as stated in the comment. As discussed in that revised response, an accurate statement is that the maximum estimated emission from the stack relates to predicted fenceline concentration of about 0.002 pCi/L, which in turn would result in an incremental increase of less than 0.5 mrem/yr dose. In other words, the 0.5 pCi/L cited by Ohio EPA is the project standard upon which

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

the modeling was performed, whereas the actual incremental increase at the fenceline, resulting from the estimated maximum stack emission is 0.002 pCi/L.

The dose reported in the 1996 Site Environmental Report was calculated using the methodology described in NCRP 78. The lung organ weighting factor of 0.12 from ICRP 26 was used as part of the dose estimation equation. The dose calculated from the concentration resulting from the 0.002 pCi/L increase is 1.5 mrem/year.

The dose calculation of 0.5 mrem/year presented by IT uses the same radon dose estimation methodology described in NCRP 78 but incorporates the lung organ weighting factor of 0.04 from ICRP 66, a more recent publication with organ weighting factor recommendations for converting dose in rads to the lungs to whole body dose equivalent. As can be seen, this results in a factor of 3 difference decrease in doses.

The use of the ICRP 66 lung organ weight factor is in accordance with the radon dose estimates from the recent Fernald Dosimetry Reconstruction Project. The incremental increase in the fence line dose, as a result of the maximum estimated emissions from the stack is less than 0.5 mrem/year, which is still significantly less than the 450 mrem/month for the onsite worker, as discussed in the subject revised response.

As discussed in the response to Ohio EPA General Comment #3, DOE is currently conducting air dispersion modeling for Radon-222 and particulate emissions resulting from OU1 remedial activities. The results of these modeling activities will be presented in the revision of the IEMP (scheduled for submittal in September 1998) and used to support modifications to the IEMP air monitoring program

Action: No action required, other than to conduct the air dispersion modeling and present results in next IEMP revision, as discussed in the response to Ohio EPA General Comment #3.

Comment #: 5

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #:

Page #:

Line #:

Code: general

Comment: These comments address the excavation strategies for the Clearwell and Waste Pit No. 3.

1. During the last part of neat line excavation, i.e., the removal of the liner and the underlying one foot of native materials, the excavation should be graded to drain water away from the excavation face.
2. During directed excavation, drainage and berms should be maintained to minimize water infiltration.

Response: 1. Because the finish cut elevation for the Clearwell and Waste Pit No. 3 liner removal will be contoured relative to the elevation of the bottom of waste pit liner materials, it may not always be possible to drain water away from the excavation face during the last part of the neat line excavation.

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

Specifically, although grading to drain away from the excavation face will be performed when possible, it is not anticipated that it will be practical to maintain a finished contour for liner material excavation graded to drain water away from the excavation face at all times. As stated in the response to Ohio EPA Original General Comment #5 on the Draft RD Package, however, the liner/subsoil will be used to construct segregation berms, thereby preventing contact stormwater (i.e., stormwater falling within the liner area) and non-contact stormwater (i.e., stormwater falling within the newly excavated subsoils area) from contacting one another.

2. DOE is committed to implementing whatever steps are necessary and practical to minimize water infiltration during directed excavation. As stated in the Excavation Plan (e.g., Sections 6.1, 6.2.2.1, and elsewhere), stormwater from outside of the excavation area will be controlled and directed away from the area (e.g., by placing berms around the excavation area, where necessary). Within the waste pits, themselves, the Excavation Plan commits to the continued collection of stormwater, utilizing measures similar to those used during the excavation of the waste.

Action: No further action required.

Comment #: 6

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Page #: Line #:

Code: general

Comment: This comment addresses excavation of Waste Pit Nos. 1, 2, 4, 5, and 6. During directed excavation in the glacial tills, berms and grading should be maintained to minimize infiltration.

Response: See response to Part 2 of Ohio EPA General Comment #5.

Action: No further action required.

Comment #: 7

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Page #: Line #:

Code:

Comment: A hydrogeologist from the AR&WWT Project with extensive on-site experience should be empowered to make field decisions regarding the location and existence of the various strata encountered during excavations. He/she should be present when excavations are within three feet of as-built liner elevations in Waste Pit No. 3 and the Clearwell and especially when sumps are dug in these locations. This geologist should determine when the various strata have been encountered. That is, he/she should make the determination where the pit waste/compacted liner interface occurs, the clay liner to till interface, and till/unsaturated GMA interface, etc.

1672

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

**Response:** This comment highlights Ohio EPA's concern that the excavation workers accurately identify the interfaces of the various strata beneath each waste pit and especially beneath Pit 3 and the Clearwell. DOE agrees that accurate identification of the various strata by the workers conducting the excavation is important to ensure that leakage to the underlying unsaturated portion of the GMA is minimized during the pit excavations. It is agreed that an experienced geologist (or hydrogeologist) from the Aquifer Restoration and Wastewater Treatment Project (ARWWP) should be involved in the identification of the interfaces between: pit waste, liners, till(if present), and unsaturated GMA.

**Action:** Prior to pit excavation, documentation regarding the depth to the base of the wastes within all pits and the Clearwell will be reviewed by an experienced ARWWP geologist. Consensus will then be reached between this geologist and the WPRAP regarding the elevations/depths where the various interfaces are expected in each of the pits and the Clearwell. Briefings will be held with the excavation workers prior to initiating excavation in each pit. This briefing will outline the expected pit profile and expected depth to the various basal interfaces. The ARWWP geologist will attend these briefings.

For Waste Pits 1, 2, 4, 5, and 6, the ARWWP geologist will be notified by the WPRAP if any interface is not located where it was predicted. The geologist will assist in the field as needed to address interface concerns.

For Waste Pit 3 and the Clearwell, the WPRAP will notify the Manager of the Hydrogeology Section of the ARWWP when the excavations within Pit 3 and the Clearwell are within 3 feet of the expected top of the compacted liner. An ARWWP geologist will be present as necessary to assist in the initial identification of the above described interfaces so that excavation equipment operators can be trained to distinguish these interfaces. This geologist will be available to consult with the WPRAP as necessary throughout the excavation of the basal portions of Waste Pit 3 and the Clearwell to ensure that appropriate identification of the various interfaces continues for the duration of the excavation.

**Comment #:** 8

**Commenting Organization:** Ohio EPA

**Commentor:** OFFO

**Section #:**

**Page #:**

**Line #:**

**Code:**

**Comment:** It is Ohio EPA's expectation that the design of the directed excavations will be a continuation of the IRDP processes currently being used in the SCEP.

**Response:** The FDF Soils Characterization & Excavation Project (SCEP) will direct subsoils excavations exactly as presented in the Sitewide Excavation Plan (SEP), and in the Area 6 Integrated Remedial Design Package (IRDP), and will track movement of these subsoils as described in the SEP and the WAC Attainment Plan. In addition, through the directed excavation process, the SCEP will coordinate the movement and placement of these soils with the movement and placement of other FEMP materials destined for disposal in the OSDF.



**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

1672

Action: No further action required.

**Responses to Comments**

Comment #: 9

Commenting Organization: Ohio EPA

Commentor: DSW

Section #:

Page #:

Line #:

Code:

Original Comment #: 14

Comment: The response to this comment is that "Stormwater controls for storage piles for pre-operational activities addressed in section 3.2 of the Site Preparation Package. Stormwater controls for storage piles for the operational activities (i.e., waste excavation and drying) were given in Table 3-2c of the Design Criteria and Assumptions section and will be further addressed in the Operational Environmental Control Plan which will be provided as part of the future RA Documents Package". Section 3.2 of the Site Preparation Package states that "Stockpiles will be managed with appropriate run-on/runoff and dust suppression controls". This does not adequately address erosion, sediment and storm water. Table 3-2c of the Design Criteria and Assumptions section is the RCRA Substantive Permitting Requirements and address RCRA waste stock piles. The Description of Operation and Processes section covered most aspects of storm water control except specifically how erosion, sediment and storm water on storage piles would be handled. The action taken in response to this comment is adequate. The new section (2.8.6) of the Description of Operation and Processes is appropriately located and addresses specifically the controls that will be used for storage piles. However, this section states that "Management control of storm water which falls on storage piles during the facility construction period is addressed in section 6.1 of the Pre-Operational Environmental Control Plan.", but section 6.1 of the Pre-Operational Environmental Control Plan describes where water will flow and that some will flow into the SWM pond in the northeast portion of the area, not how controls for storage piles will be installed and maintained. Section 6.5.2 of the Pre-Operational Environmental Control Plan does state that "To the extent practical and necessary, open excavations and exposed materials that would add to sedimentation concerns would be covered". This is a more appropriate description of controls that would be used on storage piles than that found in section 6.1. Additionally the control of sheet flow through the installation of silt fence as described in the new section 2.8.6 of the Description of Operation and Processes could be included. The response and action refer to the Operational Environmental Control Plan which will be provided as part of the future RA Documents package and the WPRAP SWMP respectively. Are these the same document?

Response: The initial Ohio EPA comment 14 was related to the Description of Operation and Processes section of the RD Documents package. Section 2.8.6 was added to the description of Operations and Processes document to clarify this issue. The above comment acknowledges that the new section (2.8.6) of the Description of Operation and Processes is appropriately located and addresses specifically the

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

controls that will be used for storage piles. It appears that the first sentence of Section 2.8.6 has caused some confusion.

Section 6.1 of the Pre-Operational Environmental Control Plan is entitled Existing Storm water Management Structures and was given as a cross reference to clarify the routing and disposition of stormwater runoff from the OU1 site areas on which storage piles could be located during facility construction.

Section 6.5.2 of the Pre-Operational Environmental Control Plan is entitled Excessive Rainfall and addresses issues related to rainfall events in excess of the 25-year, 24-hour storm event.

The Operational Environmental Control Plan and the WPRAP Stormwater/Wastewater Management Plan (SWMP) are two separate documents which are part of the RA Documents Package to be submitted to the EPAs for review and approval.

**Action:** The first sentence of the first paragraph of Section 2.8.6 of the Description of Operations and Processes document will be deleted. Both the Operational Environmental Control Plan and the SWMP will be developed and submitted as a part of the RA Documents Package, which is scheduled for submittal to the EPAs by September 25, 1998, for review and approval.

**Comment #:** 10

**Commenting Organization:** Ohio EPA

**Commentor:** DSW

**Section #:** Page #:

**Line #:**

**Code:**

**Original Comment #:** 42 and 46

**Comment:** This section of the WPRAP describes the project specific sampling and analysis to be conducted. It is agreed that the noncontact storm water sampling at the SWM pond is a point source to Paddys Run. However the plan describes other flow paths of noncontact storm water to Paddys Run. Deferring sampling of these other routes of flow to the IEMP sampling is not sufficient. It is incumbent upon the project to demonstrate that remedial activities are not causing undue releases of contaminants outside the project boundaries. The IEMP monitors collective environmental impacts, each remediation project will continue to be responsible for the design and execution of its own monitoring activities to demonstrate compliance with respective project specific ARARs and to obtain necessary immediate feedback required to track the effectiveness of these controls (from section 1.3 of the IEMP). Ohio EPA expects the project will be able to demonstrate that the noncontact runoff from the project has contaminant levels below FRLs and BTVs.

**Response:** As noted in the response to the previous Ohio EPA Original Comment #42, these "other routes of flow" to Paddys Run for the noncontact stormwater originating in the OU1 area, lead to the drainage pipe which discharges into the Pilot Plant Drainage Ditch, which is IEMP sampling point SWD-03. As stated previously, this sampling location is immediately down stream of the WPRAP project activities and

**RESPONSE TO USEPA AND OHIO EPA COMMENTS  
ON THE DRAFT FINAL REMEDIAL DESIGN PACKAGE  
FOR OPERABLE UNIT 1**

provides sufficient information to directly assess the impact of these noncontact stormwater streams from OU1. In addition, the Pilot Plant Drainage Ditch is monitored prior to its confluence with Paddys Run at NPDES location STRM-4005. These data are routinely evaluated through the data evaluation process defined in Section 4 of the IEMP. As defined in the IEMP, if data from these sampling locations show persistent exceedences of FRLs and BTVs, additional evaluation will be conducted to identify the probable source project, and activity and corrective actions may be implemented based on the expected duration of the activity and magnitude of the exceedences. This information will be shared with the projects on a routine basis. DOE knows of no specific regulatory drivers (i.e., project-specific ARARs) or commitments, which would dictate additional sampling of this noncontact stormwater.

Action: No action required.

Comment #: 11

Commenting Organization: Ohio EPA

Commentor: DSW

Section #: Page #:

Line #:

Code:

Original Comment #: 50

Comment: It is agreed that the OMMP describes site wide flows to the BSL and the hierarchy of shutdown decisions. The OMMP gives the BSL the highest treatment priority. The concern of Ohio EPA is that, even though the BSL has the highest priority, shutdowns to the BSL currently result in overflows in OU1 to the swale. With additional volume being generated in OU1 and the OSDF as indicated in the original comment, Ohio EPA sees the potential for increased overflows to occur. This has not been adequately addressed through the Wastewater Integration Committee (WWIC) (section 7.2 of the OMMP) and an issue/resolution summary sheet to be included as part of the WPRAP. Resolution of these outstanding waste water issues at the BSL must be resolved prior to any operation of the OU1 facilities or excavation activities.

Response: DOE agrees that these outstanding water issues must be resolved prior to any OU1 remediation activities. These water issues, including the interrelationship of the OU1 activities with those of the entire site, will be discussed in the SWMP, which is a part of the RA Documents Package to be submitted to the EPAs for review and approval.

Action: The SWMP will be developed, and submitted as a part of the RA Documents Package, which is scheduled for submittal to the EPAs by September 25, 1998, for review and approval.